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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, MONIQUE
TRUJILLO, WILLIAM BYATT, JEREMY
DAVIS, and CHRISTOPHER CASTILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
GOOGLE TO SUBMIT DECLARATION
IN SUPPORT OF PLAINTIFFS' MOTION
TO SEAL (DKT. 429)**

Referral: The Honorable Susan van Keulen

Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, on February 26, 2022, Plaintiffs filed their Administrative Motion To Consider Whether Portions Of Plaintiffs’ Request For Order To Show Cause Re: Sanctions For Google’s Discovery Misconduct (“Motion to Seal”) (Dkt. 429);

WHEREAS, on February 26, 2022, Google received unredacted copies of Plaintiffs’ Motion to Seal and exhibits, approximately 25 of which were designated to be sealed and submitted with Dkts. 429, 430;

WHEREAS, pursuant to Civil Local Rule 79-5(e), the current deadline for Google, as the Designating Party to Plaintiffs’ Motion to Seal (Dkt. 429), to establish that such designated material is sealable, is by Saturday, March 5, 2022;

WHEREAS, the Parties agree that an extension of time of 11 days will provide Google with sufficient time to respond to Plaintiffs’ Motion to Seal (Dkt. 429);

NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 429), to March 16, 2022.

DATED: March 1, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

BOIES SCHILLER FLEXNER LLP

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Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION TO SEAL (DKT. 429). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: March 1, 2022

By /s/ Andrew H. Schapiro
Andrew H. Schapiro
Counsel on behalf of Google

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

The deadline for Google to submit a Declaration in support of Plaintiffs' Motion to Seal (Dkt. 429), shall be extended to March 16, 2022.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HONORABLE SUSAN VAN KEULEN
United States Magistrate Judge